

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a Federal Enforceable State Operating Permit

for Newport Chemical Depot (NECD)
in Vermillion County

FESOP No.: F165-14084-00003

Notice is hereby given that the above-mentioned company, located at Indiana State Road 63, Newport, Indiana 47966 has made a renewal application to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP) for the operation of a National Defense - Chemical Stockpile Storage Site.

This proposed permit is also intended to satisfy the requirements of the construction permit rules for the new equipment.

Notice is hereby given that there will be a period of thirty (30) days from the date of publication of this notice during which any interested person may comment on why this proposed permit should or should not be issued. Appropriate comments should be related to any air quality issues, interpretation of the state and federal rules, calculations made, technical issues, or the effect that the operation of this source would have on any aggrieved individuals. IDEM, OAQ does not have jurisdiction in specifying and implementing requirements for zoning, odor or noise. For such issues, please contact your local officials.

A copy of the application and draft permit is available for examination at the Clinton Public Library, 313 South Fourth Street, Clinton, Indiana, 47842. A copy of the draft permit is also available for examination at: www.IN.gov/idem/air/permits/. All statements, along with supporting documentation, should be submitted in writing to the IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana 46206-6015. If adverse comments concerning the **air pollution impact** of this draft source are received, together with a request for a public hearing, such a hearing may be held to give further consideration to this application.

Persons not wishing to comment at this time, but wishing to receive notice of future proceedings conducted related to this action, must submit a written request to the OAQ, at the above address. All interested parties of record will receive a notice of the decision on this matter and will then have fifteen (15) days after receipt of the Notice of Decision to file a petition for administrative review. Procedures for filing such a petition will be enclosed with the Notice.

Questions should be directed to Scott Pan, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (973) 575-2555, ext. 3248, or dial (800) 451-6027, press 0 and ask for extension 3-6878.

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

SP/EVP



Governor

Lori F. Kaplan
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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY

**Newport Chemical Depot (NECD)
Indiana State Road 63
Newport, Indiana 47966-0121**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

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Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: Expiration Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a National Defense - Chemical Stockpile Storage Site.

Responsible Official: Major Christopher J. Isaacson
Source Address: Indiana State Road 63, Newport, Indiana, 47966-0160
Mailing Address: P.O. Box 160, Newport, Indiana, 47966-0160
SIC Code: 9711
County Location: Vermillion
County Status: Attainment for all criteria pollutants
Source Status: Federally Enforceable State Operating Permit (FESOP)
Minor Source, under PSD Rules;
Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source, which consists of the Main Operation and the Newport Chemical Agent Disposal Facility (NECDF), includes the following emission units and pollution control devices:

Main Operation:

- (a) seventeen (17) non-emergency type generators:
- (1) three (3) diesel generators individually rated at 6 kilowatts (kW), each exhausting at one (1) stack identified as S/V 17, 18, and 19, respectively;
 - (2) one (1) diesel generator rated at 155 kW, exhausting at one (1) stack identified as S/V 20;
 - (3) one (1) fire pump engine rated at 164.1 kW, exhausting at one (1) stack identified as S/V 27;
 - (4) one (1) gasoline generator rated at 3.5 kW, exhausting at one (1) stack identified as S/V 28;
 - (5) one (1) gasoline generator rated at 4 kW, exhausting at one (1) stack identified as S/V 29;
 - (6) one (1) gasoline generator rated at 7.5 kW, exhausting at one (1) stack identified as S/V 33;
 - (7) one (1) gasoline generator rated at 7.5 kW, exhausting at one (1) stack identified as S/V 59;

- (8) two (2) gasoline-fired generators, each with maximum rated capacity of 9 horsepower (hp), each exhausting to one (1) stack (S/V 64 and 65, respectively);
- (9) one (1) diesel-fired air compressor, with maximum heat input capacity of 80 horsepower (hp), exhausting to one (1) stack, identified as S/V 66;
- (10) one (1) gasoline fired generator, located in Building 739A and rated at 5 kilowatts (kW):
- (11) one (1) gasoline fired generator, identified as NS-GN-4, rated at 20 horsepower (hp), and exhausting at one (1) stack, identified as S/V 80;
- (12) one (1) gasoline engine powered welder, identified as NS-WEL-3, rated at 11 hp, and exhausting at one (1) stack identified as S/V 84;
- (13) one (1) gasoline engine powered high-pressure washer, identified as NS-PW-1, rated at 16 hp, exhausting at one (1) stack identified as S/V 86; and
- (14) one (1) gasoline fired generator, identified as NS-GN-x rated at 32 horsepower (hp), and exhausting at one (1) stack, identified as S/V 95.
- (b) twenty-four (24) emergency type generators:
 - (1) one (1) diesel generator rated at 250 kW, exhausting at one (1) stack identified as S/V 21;
 - (2) one (1) diesel generator rated at 155 kW, exhausting at one (1) stack identified as S/V 22;
 - (3) one (1) diesel generator rated at 250 kW, exhausting at one (1) stack identified as S/V 23;
 - (4) one (1) diesel generator rated at 250 kW, exhausting at one (1) stack identified as S/V 24;
 - (5) one (1) diesel generator rated at 255 kW, exhausting at one (1) stack identified as S/V 25;
 - (6) two (2) gasoline generators individually rated at 4 kW, each exhausting at one (1) stack identified as S/V 30 and 34, respectively;
 - (7) two (2) natural gas generators individually rated at 125 kW, each exhausting at one (1) stack identified as S/V 55 and S/V 56, respectively;
 - (8) one (1) 941 PDS trailer rated at 25 kW, exhausting at one (1) stack identified as S/V 60;
 - (9) one (1) diesel-fired generator, with a maximum rated capacity of 67 horsepower (hp), exhausting to one (1) stack (S/V 63);
 - (10) one (1) diesel fuel fired generator, rated at 125 kW, exhausting at one (1) stack, identified as S/V 96;

- (11) two (2) diesel fuel fired generators, each rated at 12 kW, each exhausting at one (1) stack identified as S/V 97 and 98, respectively;
 - (12) one (1) diesel fuel fired generator for Sprung Structure, rated at 350 kW, to be installed in 2003, identified as S/V 99;
 - (13) two (2) diesel fired air compressors, rated at 76 hp and 102 hp, respectively, and identified as w-185 and w-375, respectively;
 - (14) six (6) gasoline fired generators, each rated at 5.6 hp; and
 - (15) one (1) diesel fuel fired generator, rated at 125 kW.
- (c) ten (10) gasoline pumps (internal combustion engines):
- (1) three (3) pumps, located in Building 733K and each rated at 20 horsepower (HP);
 - (2) one (1) pump, located in Building 717A and rated at 20 HP;
 - (3) one (1) pump, located in Building 739A and rated at 20 HP;
 - (4) one (1) pump, located in Building 739A and rated at 12 HP;
 - (5) two (2) pumps, located in Building 739A and each rated at 8 HP;
 - (6) one (1) pump, located in Building 710 and rated at 7.5 HP; and
 - (7) one (1) pump, located in Building 725A and rated at 3 HP;
- (d) five (5) maintenance units (internal combustion engines):
- (1) three (3) gasoline fired engines, located in Building 739A and each rated at 5.5, 20 and 10 HP, respectively;
 - (2) one (1) diesel fired engine, located in Building 725A and rated at 65 HP; and
 - (3) one (1) gasoline fired engine, located in Building 725A and rated at 55 HP;

NECDF:

- (a) four (4) emergency type generators:
- (1) two (2) emergency type #2 fuel oil fired generators, each rated at 2,250 kW, exhausting at one (1) stack identified as S/V 73;
 - (2) one (1) #2 fuel oil generator rated at 250 kW, exhausting at one (1) stack identified as S/V 75; and
 - (3) one (1) #2 fuel oil generator, rated at 750 kW, to be installed in 2002, exhausting at one (1) stack identified as S/V 100;
- (b) one (1) CDB neutralization process, identified as containing TCC Operations, Drained Agent Reactors, Hydrolysate and other Tanks, exhausting through one (1) stack identified as S/V 76, air emissions controlled by carbon filters and hydrolysate treated by the SCWO listed in (c);
- (c) two (2) supercritical water oxidation (SCWO) reactors, identified as Thermal Oxidizers,

each rated at 50,202 pounds per day of hydrolysate feed, and exhausting to one (1) stack identified as S/V 77; and

- (d) the pollutant emitting activities related to the construction of the NECDF:
 - (1) operation of generators;
 - (2) operation of internal combustion (IC) engines; and
 - (3) miscellaneous construction related fugitive and non-fugitive insignificant activities.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) one (1) natural gas fired boiler identified as Building 7700 Boiler rated at 2.51 million (MM) British thermal units per hour, constructed prior to September 21, 1983, and using #2 fuel oil as a backup, exhausting at one (1) stack;
- (b) one (1) 1,000 gallon capacity diesel fuel underground storage tank (UST) identified as Tank #144, exhausting at one emission point;
- (c) one (1) 550 gallon capacity diesel fuel UST identified as Tank #6178, exhausting at one emission point;
- (d) one (1) 275 gallon capacity diesel fuel AST identified as Tank 733K, exhausting at one emission point;
- (e) one (1) 1,000 gallon diesel fuel UST, identified as ORO;
- (f) one (1) 550 gallon capacity No. 2 fuel oil UST identified as Tank 7703-1, exhausting at one emission point;
- (g) one (1) 18,000 gallon capacity propane AST identified as Propane Tank at Propane Station;
- (h) one (1) 550 gallon diesel UST, identified as Tank #1;
- (i) one (1) diesel aboveground storage tank (AST), ID 710, with a storage capacity of 550 gallons (insignificant activity);
- (j) one (1) 530 gallon diesel AST for Sprung Structure;
- (k) one (1) 10,000 gallon capacity gasoline UST, exhausting at one emission point;
- (l) two (2) walk-in paint booths with total potential VOC and PM emissions of less than 3 lb/hr and 5 lb/hr, respectively, exhausting at two emission points;
- (m) four (4) cold cleaning degreasing units in buildings 716A and 717A, installed in 2000, using less than 145 gallons of solvent per year;
- (n) one (1) woodworking operation exhausting at one (1) emission point;
- (o) one (1) mobile abrasive blaster rated at 107.1 pounds blast media;

- (p) one (1) gasoline dispensing station with fuel dispensing of less than 1,300 gallons per day, exhausting at one emission point;
- (q) additional miscellaneous insignificant activities as:
 - (1) boilers/heaters (excluding Building 7700);
 - (2) medical lab;
 - (3) wastewater treatment facility;
 - (4) combustion start-up;
 - (5) 10,000 gallon capacity diesel fuel storage tank;
 - (6) fire training activities;
 - (7) asbestos abatement projects;
 - (8) water treatment;
 - (9) toxic laundry;
 - (10) pesticides/herbicides;
 - (11) structural painting;
 - (12) welding;
 - (13) air conditioning & refrigeration units;
 - (14) fire suppression systems;
 - (15) road paving;
 - (16) fixed abrasive blaster;
 - (17) protective mask cleaning;
 - (18) weapons cleaning; and
 - (19) miscellaneous chemical usage;
- (r) miscellaneous fugitive activities:
 - (1) landfills ;
 - (2) small arms firing;
 - (3) storage piles;
 - (4) road dust; and
 - (5) prairie burns, stated as up to 110 acres per year.
- (s) one (1) oxyacetylene and stick welding station, with maximum wire consumption rate of

2.01 pounds per hour.

- (t) paved and unpaved roads and parking lots with public access;
- (u) purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process;
- (v) equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment;
- (w) on-site fire and emergency response training approved by the department;
- (x) stationary fire pumps;
- (y) any unit emitting greater than 1 pound per day but less than 5 pounds per day or 1 tons per year of a single HAP;
- (z) any unit emitting greater than 1 pound per day but less than 12.5 pounds per day or 2.5 tons per year of any combination of HAPs.
- (aa) two (2) propane fired hot water heaters, each rated at 0.179 million British thermal units per hour (MMBtu/hr);
- (bb) one (1) diesel generator and one (1) air compressor, each rated at 5 HP;
- (cc) one (1) diesel fired heater, rated at 0.406 million British thermal units (MMBtu) per hour, exhausting at one (1) stack, identified as S/V 87;
- (dd) four (4) portable kerosene heaters, each rated at 0.189, 0.189, 0.149 and 0.162 MMBtu/hr, respectively, and each exhausting at one (1) stack, identified as S/V 88, S/V 89, S/V 90 and S/V 91, respectively;
- (ee) three (3) propane heaters, each rated at 0.028, 0.095 and 0.095 MMBtu/hr, respectively, and each exhausting at one (1) stack, identified as S/V 92, S/V 93 and S/V 94, respectively; and
- (ff) the following equipment to be temporarily installed and operated at the existing source:
 - (1) internal combustion engines:
 - (A) non-emergency generators;
 - (B) pressure washers;
 - (C) air compressors;
 - (D) welders;
 - (E) winches;
 - (F) water pumps;
 - (G) cutting torches;
 - (H) emergency lights.
 - (2) above ground storage tanks with storage capacity less than 10,500 gallons;
 - (3) heaters;
 - (4) smoke bombs.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

- (1) incorporated as originally stated,
- (2) revised, or
- (3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall furnish to IDEM, OAQ within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.[326 IAC 2-8-4(5)(E)]
- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover

the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ

may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section)
or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAQ, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive

measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

- (1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015

Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (j) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC

2-8-15(a) and the following additional conditions:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.24 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

- (a) The requirements to obtain a permit revision under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction work is suspended for a continuous period of one (1) year or more.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable;
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality

100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days from the date of issuance of this permit.

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ

upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:

- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

**C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

Fourteen (14) non-emergency type generators in main operation:

- (a) three (3) diesel generators individually rated at 6 kilowatts (kW), each exhausting at one (1) stack identified as S/V17, 18, and 19, respectively;
- (b) one (1) diesel generator rated at 155 kW, exhausting at one (1) stack identified as S/V 20;
- (c) one (1) fire pump engine rated at 164.1 kW, exhausting at one (1) stack identified as S/V 27;
- (d) one (1) gasoline generator rated at 3.5 kW, exhausting at one (1) stack identified as S/V 28;
- (e) one (1) gasoline generator rated at 4 kW, exhausting at one (1) stack identified as S/V 29;
- (f) one (1) gasoline generator rated at 7.5 kW, exhausting at one (1) stack identified as S/V 33;
- (g) one (1) gasoline generator rated at 7.5 kW, exhausting at one (1) stack identified as S/V 59;
- (h) one (1) gasoline generator, located in Building 739A and rated at 5 kilowatts (kW);
- (i) one (1) gasoline fired generator, identified as NS-GN-4, rated at 20 horsepower (hp), and exhausting at one (1) stack, identified as S/V 80;
- (j) one (1) gasoline engine powered welder, identified as NS-WEL-3, rated at 11 hp, and exhausting at one (1) stack identified as S/V 84;
- (k) one (1) gasoline engine powered high-pressure washer, identified as NS-PW-1, rated at 16 hp, exhausting at one (1) stack identified as S/V 86; and
- (l) one (1) gasoline fired generator, identified as NS-GN-x rated at 32 horsepower (hp), and exhausting at one (1) stack, identified as S/V 95.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Carbon Monoxide (CO) and Nitrogen Oxides (NOx) [326 IAC 2-8-4][326 IAC 2-2]

Pursuant to 326 IAC 2-8-4, operation of each of the non-emergency generators shall not exceed 360 hours per twelve (12) consecutive month period. This operating limit shall limit total CO and NOx emissions from the fourteen (14) non-emergency generators to 9.70 and 2.76 tons per twelve (12) consecutive month period, respectively. Compliance with this condition shall limit total CO and NOx emissions from the source to less than 100 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 and 326 IAC 2-2 do not apply.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.1.2 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the operating limits of D.1.1.
 - (1) The hours of operation each month for each non-emergency generator; and
 - (2) The 12 month rolling total of hours of operation for each emergency generator.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.3 Reporting Requirements

A quarterly summary to document compliance with operation condition number D.1.1 shall be submitted, to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the calendar quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

Three (3) non-emergency type generators in main operation:

- (a) two (2) gasoline-fired generators, each with maximum rated capacity of 9 horsepower (hp), each exhausting to one (1) stack (S/V 64 and 65, respectively); and
- (b) one (1) diesel-fired air compressor, with maximum heat input capacity of 80 horsepower (hp), exhausting to one (1) stack, identified as S/V 66;

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Carbon Monoxide (CO) and Nitrogen Oxides (NOx) [326 IAC 2-8-4][326 IAC 2-2]

Pursuant to 326 IAC 2-8-4, the two (2) gasoline-fired generators and one (1) diesel-fired air compressor shall each be limited to 180 hours per twelve (12) consecutive month period. This is equivalent to CO and NOx emissions of 0.76 and 0.24 tons per per twelve (12) consecutive month period, respectively. Compliance with this condition shall limit total CO and NOx emissions from the source to less than 100 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 and 326 IAC 2-2 do not apply.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.2 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the operating limits of D.2.1.
 - (1) The hours of operation each month for each of the two (2) gasoline-fired generators and the one (1) diesel-fired air compressor; and
 - (2) The 12 month rolling total of hours of operation for each of the two (2) gasoline-fired generators and the one (1) diesel-fired air compressor.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.3 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

Main Operation

Twenty-four (24) emergency type generators:

- (a) one (1) diesel generator rated at 250 kW, exhausting at one (1) stack identified as S/V 21;
- (b) one (1) diesel generator rated at 155 kW, exhausting at one (1) stack identified as S/V 22;
- (c) one (1) diesel generator rated at 250 kW, exhausting at one (1) stack identified as S/V 23;
- (d) one (1) diesel generator rated at 250 kW, exhausting at one (1) stack identified as S/V 24;
- (e) one (1) diesel generator rated at 255 kW, exhausting at one (1) stack identified as S/V 25;
- (f) two (2) gasoline generators individually rated at 4 kW, each exhausting at one (1) stack identified as S/V 30 and 34, respectively;
- (g) two (2) natural gas generators individually rated at 125 kW, each exhausting at one (1) stack identified as S/V 55 and S/V 56, respectively;
- (h) one (1) 941 PDS trailer rated at 25 kW, exhausting at one (1) stack identified as S/V 60;
- (i) one (1) diesel-fired generator, with a maximum rated capacity of 67 horsepower (hp), exhausting to one (1) stack (S/V 63);
- (j) one (1) diesel fuel fired generator, rated at 125 kW, exhausting at one (1) stack, identified as S/V 96;
- (k) two (2) diesel fuel fired generators, each rated at 12 kW, each exhausting at one (1) stack identified as S/V 97 and 98, respectively;
- (l) one (1) diesel fuel fired generator for Sprung Structure, rated at 350 kW, to be installed in 2003, identified as S/V 99;
- (m) two (2) diesel fired air compressors, rated at 76 hp and 102 hp, respectively, and identified as w-185 and w-375, respectively;
- (n) six (6) gasoline fired generators, each rated at 5.6 hp; and
- (o) one (1) diesel fuel generator, rated at 125 kW.

NECDF

Four (4) emergency type generators:

- (a) one (1) #2 fuel oil fired generator rated at 250 kW, exhausting at one (1) stack identified as S/V 75;
- (b) two (2) #2 fuel oil fired generators, each rated at 2,250 kW, exhausting at one (1) stack identified as S/V 73; and
- (c) one (1) #2 fuel oil fired generator, rated at 750 kW, to be installed in 2002, exhausting at one (1) stack identified as S/V 100.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 Carbon Monoxide (CO) and Nitrogen Oxides (NOx) [326 IAC 2-8-4][326 IAC 2-2]

Pursuant to 326 IAC 2-8-4, operation of each of the emergency generators shall not exceed 500 hours per twelve (12) consecutive month period. This operating limit shall limit total CO and NOx emissions from the twenty-eight (28) emergency generators to 16.13 and 67.56 tons per twelve (12) consecutive month period, respectively. Compliance with this condition shall limit total CO and NOx emissions from the source to less than 100 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 and 326 IAC 2-2 do not apply.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.3.2 Record Keeping Requirements

- (a) To document compliance with Condition D.3.1, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the operating limits of D.3.1.
 - (1) The hours of operation each month for each emergency generator; and
 - (2) The 12 month rolling total of hours of operation for each emergency generator.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.3 Reporting Requirements

A quarterly summary to document compliance with operation condition number D.3.1 shall be submitted, to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the calendar quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

Main Operation

- (a) Ten (10) gasoline pumps (internal combustion engines):
 - (1) three (3) pumps, located in Building 733K and each rated at 20 horsepower (HP);
 - (2) one (1) pump, located in Building 717A and rated at 20 HP;
 - (3) one (1) pump, located in Building 739A and rated at 20 HP;
 - (4) one (1) pump, located in Building 739A and rated at 12 HP;
 - (5) one (1) pump, located in Building 717A and rated at 10 HP;
 - (6) one (1) pumps, located in Building 739A and rated at 8 HP;
 - (7) one (1) pump, located in Building 710 and rated at 7.5 HP; and
 - (8) one (1) pump, located in Building 725A and rated at 3 HP;
- (b) Five (5) maintenance units (internal combustion engines):
 - (1) three (3) gasoline fired engines, located in Building 739A and each rated at 5.5, 20 and 10 HP, respectively;
 - (2) one (1) diesel fired engine, located in Building 725A and rated at 65 HP; and
 - (3) one (1) gasoline fired engine, located in Building 725A and rated at 55 HP.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.4.1 Carbon Monoxide (CO) and Nitrogen Oxides (NOx) [326 IAC 2-8-4][326 IAC 2-2]

Pursuant to 326 IAC 2-8-4, operation of each of the fifteen (15) internal combustion (IC) engines shall not exceed 100 hours per twelve (12) consecutive months period. These operating limits shall limit total CO and NOx emissions from the fifteen (15) IC engines to 5.08 and 0.35 tons per twelve (12) consecutive month period, respectively (emissions are calculated by using the emission factors for IC engines provided in Chapter 3 of the most recent edition of USEPA's AP-42). Compliance with this condition shall limit total CO and NOx emissions from the source to less than 100 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 and 326 IAC 2-2 do not apply.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.4.2 Record Keeping Requirements

- (a) To document compliance with Condition D.4.1, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the CO and NOx emission limits established in Condition D.4.1.
 - (1) The hours of operation each month for each of the fifteen (15) IC engines; and
 - (2) The 12 month rolling total of hours of operation for each of the fifteen (15) IC engines.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.3 Quarterly Reporting

A quarterly summary to document compliance with operation condition number D.4.1 shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the calendar quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.5

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) CDB neutralization process, identified as containing TCC Operations, Drained Agent Reactors, Hydrolysate and other Tanks, exhausting through one (1) stack identified as S/V 76, with air emissions controlled by carbon filters and hydrolysate treated by the SCWO reactors listed in (b).
- (b) Two (2) supercritical water oxidation (SCWO) reactors, identified as Thermal Oxidizers, each rated at 50,202 pounds per day of hydrolysate feed, and exhausting to one (1) stack identified as S/V 77, with air emissions controlled by carbon filters.

Above listed units are part of Newport Chemical Agent Disposal Facility (NECDF) within Newport Chemical Depot (NECD).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.5.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, the CDB neutralization process shall process no more than 6 Tonne containers per day. The concentration of VX in the exhaust gas, when emitting to the atmosphere, shall be limited to 0.06 micrograms per cubic meter. This operating limit shall limit total volatile organic compound (VOC) emissions from the CDB process to 1.36 tons per year. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.5.2 Sulfur Dioxide, Volatile Organic Compounds, Carbon Monoxide and Nitrogen Oxides [326 IAC 2-8-4][326 IAC 2-2]

Pursuant to 326 IAC 2-8-4, the input to each of the two (2) SCWO reactors shall not exceed 50,202 pounds per day of hydrolysate feed. This operating limit shall limit total SO₂, VOC, CO and NO_x emissions from the SCWO to 13.97, 0.01, 1.93 and 4.78 tons per twelve (12) month period, respectively. Compliance with this condition shall limit total SO₂, VOC, CO and NO_x emissions from the source to less than 100 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 and 326 IAC 2-2 do not apply. Any change or modification to each of the SCWO reactors that may increase the rated hydrolysate feed to above 50,202 pounds per day shall obtain the approval of IDEM, OAQ, before such changes may take place.

D.5.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.5.4 Carbon Adsorption Filters

The carbon adsorption filter banks, which are part of the neutralization CDB process, shall be operated at all times when hydrolysate is being processed.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.5.5 Minimum Operating Temperature

The SCWO shall operate with an average temperature of at least 1,200 °F and at a minimum of no less than 900 °F or the temperature established during the latest stack test. Operation at or above this minimum temperature ensures compliance with the destruction efficiency required for correct operation of the SCWO and with the emission limitations of Condition D.5.2.

D.5.6 Visible Checks for Leaks

- (a) Leak checks shall be performed once per shift during normal daylight when the CDB process is operating. A trained employee shall record any detected leaks and the date of such leaks.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, checks shall be taken during that part of the operation that would normally be expected to cause the greatest potential for liquid leaks.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of liquid leaks for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.5.7 Record Keeping Requirements

- (a) To document compliance with Conditions D.5.1, D.5.2 and D.5.5, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken daily and shall be complete and sufficient to establish compliance with the SO₂, VOC, CO and NO_x emission limits established in Conditions D.5.1 and D.5.2.
 - (1) The number of Tonne containers and the amount of hydrolysate processed each day;
 - (2) A log of the dates of operation;
 - (3) The minimum operating temperature in °F; and
 - (4) The average operating temperature in °F.
- (b) To document compliance with Condition D.5.6, the Permittee shall maintain records of once per shift visible leak checks of the CDB neutralization process.

- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.5.8 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.5.1, D.5.2 and D.5.5 shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, of this permit, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.6 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) The pollutant emitting activities related to the construction of the NECDF:
- (1) operation of generators;
 - (2) operation of internal combustion (IC) engines; and
 - (3) miscellaneous construction related fugitive and non-fugitive insignificant activities.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.6.1 Sulfur Dioxide, Volatile Organic Compounds, Carbon Monoxide and Nitrogen Oxides [326 IAC 2-8-4][326 IAC 2-2]

Pursuant to 326 IAC 2-8-4, during the construction of the NECDF, the emissions of SO₂, VOC, CO and NO_x due to the operation of generators and internal combustion (IC) engines (excluding mobile sources such as backhoes, bulldozers, and other construction equipment) related to the construction shall not exceed 1.92, 0.50, 3.23 and 3.09 tons per month, respectively. Compliance with this condition shall limit total SO₂, VOC, CO and NO_x emissions from the source to less than 100 tons per twelve (12) consecutive month period. Once the construction of the new NECDF equipment has been completed, the limits for the construction activities under Section D.6 will expire and NECDF can start operating. Therefore, the requirements of 326 IAC 2-7 and 326 IAC 2-2 do not apply.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.6.2 Record Keeping Requirements

- (a) To document compliance with Condition D.6.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the SO₂, VOC, CO and NO_x emission limits established in Condition D.6.1.
- (1) The hours of operation for each month for each generator and internal combustion (IC) engine related to the construction of the NECDF;
 - (2) The type of fuel used for each generator and internal combustion (IC) engine related to the construction of the NECDF; and
 - (3) The monthly SO₂, VOC, CO and NO_x emissions, calculated by using emission factors for generators and IC engines provided in Chapter 3 of the most recent edition of USEPA's AP-42 emission factor document.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.6.3 Quarterly Reporting

A quarterly summary of the information to document compliance with Condition D.6.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days

after the end of the calendar quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.7

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) one (1) natural gas fired boiler identified as Building 7700 Boiler rated at 2.51 million (MM) British thermal units per hr, constructed prior to September 21, 1983, and using #2 fuel oil as a backup, exhausting at one (1) stack.
- (b) Following operations, each with potential VOC emissions of less than 3 lb/hr and PM emissions of less than 5 lb/hr:
 - (1) two (2) walk-in paint booths, exhausting at two emission points;
 - (2) one (1) woodworking operation exhausting at one (1) emission point;
 - (3) one (1) mobile abrasive blaster rated at 107.1 pounds blast media;
 - (4) welding;
 - (5) fixed abrasive blaster; and
 - (6) one (1) oxyacetylene and stick welding station, with maximum wire consumption rate of 2.01 pounds per hour.
- (c) four (4) cold cleaning degreasing units in buildings 716A and 717A, installed in 1988, using less than 145 gallons of solvent per year.
- (d) the following equipment to be temporarily installed and operated at the existing source:
 - (1) internal combustion engines:
 - (A) non-emergency generators;
 - (B) pressure washers;
 - (C) air compressors;
 - (D) welders;
 - (E) winches;
 - (F) water pumps;
 - (G) cutting torches; and
 - (H) emergency lights.
 - (2) above ground storage tanks with storage capacity less than 10,500 gallons;
 - (3) heaters;
 - (4) smoke bombs.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.7.1 Particulate Matter (PM) [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the 2.51 MMBtu per hour heat input boiler shall be limited to 0.6 pounds per MMBtu heat input.

D.7.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the PM emitting units listed under item (b) of Section D.7 shall not exceed the allowable PM emission rate based on the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.7.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements; and
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

Equipment to be Temporarily Installed

D.7.4 Particulate Matter (PM-10), Sulfur Dioxide (SO₂), Volatile Organic Compounds (VOC), Carbon Monoxide (CO) and Nitrogen Oxides (NO_x) [326 IAC 2-8-4][326 IAC 2-2]

The emissions of each of PM-10, SO₂, VOC, CO and NO_x due to the operation of the equipment covered in Item (a) of this section shall be limited to 5 tons per twelve (12) consecutive month period. Compliance with this condition shall limit total PM-10, SO₂, VOC, CO and NO_x emissions from the source to less than 100 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 and 326 IAC 2-2 do not apply.

D.7.5 Tank Storage Capacities [40 CFR 60, Subpart Kb]

The storage tanks to be temporarily installed and operated at the existing source shall have individual storage capacities of less than 10,500 gallons (40 cubic meter (m³)). Therefore, the requirements of New Source Performance Standards, Subpart Kb (326 IAC 12 and 40 CFR 60.110b - 60.117b), do not apply.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.7.6 Record Keeping Requirements

To document compliance with Condition D.7.4, the Permittee shall maintain records at the source of the information necessary for determining the emissions of PM-10, SO₂, VOC, CO and NO_x, due to the equipment brought to the source temporarily. The records shall contain a minimum of the following:

- (a) The hours of operation for each month for the equipment covered;

- (b) The rated capacity and type of fuel used for internal combustion (IC) engines and heaters, and storage capacity, dimensions and material type and throughput for storage tanks;
- (c) The monthly PM-10, SO₂, VOC, CO and NO_x emissions, calculated by using emission factors for IC engines, storage tanks and heaters provided in the most recent edition of USEPA's AP-42 emission factor document.

D.7.7 Quarterly Reporting

A quarterly summary to document compliance with operation Conditions D.7.4 shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.8

FACILITY CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

The modification of the Chemical Stockpile Storage Site includes the following:

Main Operation

- (a) one (1) gasoline fired generator, identified as NS-GN-x rated at 32 horsepower (hp), and exhausting at one (1) stack, identified as S/V 95.
- (b) one (1) diesel fuel fired generator, rated at 125 kW, exhausting at one (1) stack, identified as S/V 96;
- (c) two (2) diesel fuel fired generators, each rated at 12 kW, each exhausting at one (1) stack identified as S/V 97 and 98, respectively;
- (d) one (1) diesel fuel fired emergency generator for Sprung Structure, rated at 350 kW, to be installed in 2003, identified as S/V 99.
- (e) two (2) diesel fired air compressors, rated at 76 hp and 102 hp, respectively, and identified as w-185 and w-375, respectively;
- (f) six (6) gasoline fired generators, each rated at 5.6 hp;
- (g) one (1) emergency type diesel fuel fired generator, rated at 125 kW;
- (h) one (1) diesel fuel aboveground storage tank (AST), ID 710, with a storage capacity of 550 gallons (insignificant activity); and
- (i) one (1) 530 gallon diesel fuel AST for Sprung Structure (insignificant activity).

NECDF

- (a) two (2) #2 fuel oil fired emergency generators, each rated at 2,250 kW, exhausting at one (1) stack identified as S/V 73; and
- (b) one (1) #2 fuel oil fired emergency generator in NECDF, rated at 750 kW, to be installed in 2002, exhausting at one (1) stack identified as S/V 100.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-8-11.1, WITH CONDITIONS LISTED BELOW.

Construction Conditions

General Construction Conditions

- D.8.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

- D.8.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.
- D.8.3 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Newport Chemical Depot
Source Address: Indiana State Road 63, Newport, Indiana 47966-0160
Mailing Address: P. O. Box 160, Newport, Indiana 47966-0160
FESOP No.: F165-14084-00003

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Newport Chemical Depot
Source Address: Indiana State Road 63, Newport, Indiana 47966-0160
Mailing Address: P. O. Box 160, Newport, Indiana 47966-0160
FESOP No.: F165-14084-00003

This form consists of 2 pages

Page 1 of 2

9 This is an emergency as defined in 326 IAC 2-7-1(12)
 (The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
 (The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: Newport Chemical Depot
Source Address: Indiana State Road 63, Newport, Indiana 47966-0160
Mailing Address: P. O. Box 160, Newport, Indiana 47966-0160
FESOP No.: F165-14084-00003

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Report period

Beginning: _____

Ending: _____

Boiler Affected

Alternate Fuel

Days burning alternate fuel
From To

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF AIR MANAGEMENT

COMPLIANCE DATA SECTION

FESOP Quarterly Report

SourceName: Newport Chemical Depot (NECD)
Source Address: Indiana State Road 63, Newport, Indiana 47966-0121
FESOP No.: F165-14084-00003
Facility: Fourteen (14) Non-emergency Generators
Parameter: Generator Operating Hours
Limit: 360 hours per generator per 12-consecutive month period for each non-emergency generator

YEAR _____

Non-Emergency Generator	Month: _____			Month: _____			Month: _____		
	Hour of Op. this month	Hour of Op. Prev. 11 months	Hour of Op. 12 mon. tot	Hour of Op. this month	Hour of Op. Prev. 11 months	Hour of Op. 12 mon. tot	Hour of Op. this month	Hour of Op. Prev. 11 months	Hour of Op. 12 mon. tot
(1) - 6 KW									
(2) - 6 KW									
(3) - 6 KW									
(4) - 155 KW									
(5) - 164.1 KW									
(6) - 3.5 KW									
(7) - 4 KW									
(8) - 7.5 KW									
(9) - 7.5 KW									
(10) - 5 KW									
(11) - 20 hp									
(12) - 11 hp									
(13) - 16 hp									
(14) - 32 hp									

9 No deviation occurred in this month.
9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Newport Chemical Depot
Source Address: Indiana State Road 63, Newport, Indiana 47966-0160
Mailing Address: P. O. Box 160, Newport, Indiana 47966-0160
FESOP No.: F165-14084-00003
Facility: two (2) gasoline-fired generators and one (1) diesel-fired air compressor
Parameter: SO₂, VOC, CO and NO_x
Limit: 180 hours of operation per twelve (12) consecutive month period for each generator or compressor

YEAR: _____

Month	Equipment	Column 2	Column 3	Column 2 + Column 3
		Hours of Operation This Month	Hours of Operation Previous 11 Months	Hours of Operation 12 Month Total
	Generator (64)			
	Generator (65)			
	Compressor (66)			
	Generator (64)			
	Generator (65)			
	Compressor (66)			
	Generator (64)			
	Generator (65)			
	Compressor (66)			

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Newport Chemical Depot (NECD)
Source Address: Indiana State Road 63, Newport, Indiana 47966-0121
FESOP No.: F165-14084-00003
Facility: Twenty-eight (28) emergency Generators (both main operation and NECDF)
Parameter: Generator Operating Hours
Limit: 500 hours per generator per 12-consecutive month period for each emergency generator

YEAR _____

page 1 of 2

Emergency Generator	Month: _____			Month: _____			Month: _____		
	Hour of Op. this month	Hour of Op. Prev. 11 months	Hour of Op. 12 mon. tot	Hour of Op. this month	Hour of Op. Prev. 11 months	Hour of Op. 12 mon. tot	Hour of Op. this month	Hour of Op. Prev. 11 months	Hour of Op. 12 mon. tot
(1) - 250 KW									
(2) - 155 KW									
(3) - 250 KW									
(4) - 250 KW									
(5) - 255 KW									
(6) - 4 KW									
(7) - 4 KW									
(8) - 125 KW									
(9) - 125 KW									
(10) -25 KW									
(11) - 67 hp									
(12) -125 KW									
(13) - 12 KW									
(14) - 12 KW									

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Newport Chemical Depot (NECD)
Source Address: Indiana State Road 63, Newport, Indiana 47966-0121
FESOP No.: F165-14084-00003
Facility: Twenty-eight (28) emergency Generators (both main operation and NECDF)
Parameter: Generator Operating Hours
Limit: 500 hours per generator per 12-consecutive month period for each emergency generator

YEAR _____

page 2 of 2

Emergency Generator	Month: _____			Month: _____			Month: _____		
	Hour of Op. this month	Hour of Op. Prev. 11 months	Hour of Op. 12 mon. tot	Hour of Op. this month	Hour of Op. Prev. 11 months	Hour of Op. 12 mon. tot	Hour of Op. this month	Hour of Op. Prev. 11 months	Hour of Op. 12 mon. tot
(15) - 350 KW									
(16) - 76 hp									
(17) - 102 hp									
(18) - 5.6 hp									
(19) - 5.6 hp									
(20) - 5.6 hp									
(21) - 5.6 hp									
(22) - 5.6 hp									
(23) - 5.6 hp									
(24) - 125 KW									
(25) - 250 KW									
(26) - 2,250 KW									
(27) - 2,250 KW									
(28) - 750 KW									

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Newport Chemical Depot
Source Address: Indiana State Road 63, Newport, Indiana 47966-0160
Mailing Address: P. O. Box 160, Newport, Indiana 47966-0160
FESOP No.: F165-14084-00003
Facility: The fifteen (15) internal combustion engines
Parameter: SO₂, VOC, CO and NO_x
Limit: 100 hours of operation per twelve (12) consecutive month period for each of the fifteen (15) internal combustion engines.

YEAR: _____

Bldg.	Unit ID.	Month: _____			Month: _____			Month: _____		
		Hour of Op. this month	Hour of Op. Prev. 11 months	Hour of Op. 12 mon. tot	Hour of Op. this month	Hour of Op. Prev. 11 months	Hour of Op. 12 mon. tot	Hour of Op. this month	Hour of Op. Prev. 11 months	Hour of Op. 12 mon. tot
733K	20 hp pump-#1									
733K	20 hp pump-#2									
733K	20 hp pump-#3									
717A	20 hp pump									
739A	20 hp pump									
739A	12 hp pump									
717A	10 hp pump									
739A	8 hp pump									
710	7.5 hp pump									
725A	3 hp pump									
739A	5.5 hp maint. unit									
739A	20 hp maint. unit									
739A	10 hp maint. unit									
725A	65 hp maint. unit									
725A	55 hp maint. unit									

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Monthly Report

Source Name: Newport Chemical Depot
Source Address: Indiana State Road 63, Newport, Indiana 47966-0160
Mailing Address: P. O. Box 160, Newport, Indiana 47966-0160
FESOP No.: F165-14084-00003
Facility: CDB Neutralization Process and SCWO Reactors
Parameter: SO₂, VOC, CO and NO_x
Limit: 6 tonne containers per day for CDB Process and hydrolysate feed of 50,202 pounds per day for each of the two (2) SCWO reactors

Month: _____ Year: _____

Day	# of Tonne Container Used	hydrolysate feed (lb/day)		Day	# of Tonne Container Used	hydrolysate feed (lb/day)	
		SCWO-1	SCWO-2			SCWO-1	SCWO-2
1				17			
2				18			
3				19			
4				20			
5				21			
6				22			
7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16							

- 9 No deviation occurred in this month.
9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Newport Chemical Depot
Source Address: Indiana State Road 63, Newport, Indiana 47966-0160
Mailing Address: P. O. Box 160, Newport, Indiana 47966-0160
FESOP No.: F165-14084-00003
Facility: Generators and internal combustion (IC) engines related to the construction of the NECDF
Parameter: SO₂, VOC, CO and NO_x
Limit: SO₂ - 1.92 tons per month; VOC - 0.50 tons per month
CO - 3.23 tons per month NO_x - 3.09 tons per month
(Emissions shall be determined by using emission factors for generators and IC engines provided in Chapter 3 of the most recent edition of USEPA's AP-42)

YEAR: _____

Month	Equipment	Hours of Operation This Month	Type of Fuel Used	Emissions (tons/month)			
				SO ₂	VOC	CO	NO _x
Month 1	Generators						
	IC Engines						
	Total						
Month 2	Generators						
	IC Engines						
	Total						
Month 3	Generators						
	IC Engines						
	Total						

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Newport Chemical Depot
Source Address: Indiana State Road 63, Newport, Indiana 47966-0160
Mailing Address: P. O. Box 160, Newport, Indiana 47966-0160
FESOP No.: F165-14084-00003
Facility: Equipment brought to the source temporarily
Parameter: PM-10, SO₂, VOC, CO and NO_x
Limit: 5 tons per 12-consecutive month period, for each pollutant.

YEAR: _____

Unit ID.	Month: _____			Month: _____			Month: _____		
	Emissions this month	Emissions prev. 11 months	12 mon. emission total	Emissions this month	Emissions prev. 11 months	12 mon. emission total	Emissions this month	Emissions prev. 11 months	12 mon. emission total
IC Engines									
Storage Tanks									
Heaters									
Total									

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Newport Chemical Depot
Source Address: Indiana State Road 63, Newport, Indiana 47966-0160
Mailing Address: P. O. Box 160, Newport, Indiana 47966-0160
FESOP No.: F165-14084-00003

Months: _____ to _____ Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

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Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Background and Description

Source Name: Newport Chemical Depot (NECD)
Source Location: Indiana State Road 63, Newport, Indiana, 47966-0160
County: Vermillion
SIC Code: 9711
Operation Permit No.: F165-14084-00003
Permit Reviewer: Scott Pan/EVP

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Newport Chemical Depot (NECD) relating to the operation of a National Defense - Chemical Stockpile Storage Site. Newport Chemical Depot was issued FESOP F165-5470-00003 on December 11, 1996.

Permitted Emission Units and Pollution Control Equipment

The source, which consists of the Main Operation and the Newport Chemical Agent Disposal Facility (NECDF), includes the following permitted emission units and pollution control devices:

Main Operation:

- (a) sixteen (16) non-emergency type generators:
 - (1) three (3) diesel generators individually rated at 6 kilowatts (kW), each exhausting at one (1) stack identified as S/V 17, 18, and 19, respectively;
 - (2) one (1) diesel generator rated at 155 kW, exhausting at one (1) stack identified as S/V 20;
 - (3) one (1) fire pump engine rated at 164.1 kW, exhausting at one (1) stack identified as S/V 27;
 - (4) one (1) gasoline generator rated at 3.5 kW, exhausting at one (1) stack identified as S/V 28;
 - (5) one (1) gasoline generator rated at 4 kW, exhausting at one (1) stack identified as S/V 29;
 - (6) one (1) gasoline generator rated at 7.5 kW, exhausting at one (1) stack identified as S/V 33;
 - (7) one (1) gasoline generator rated at 7.5 kW, exhausting at one (1) stack identified as S/V 59;
 - (8) two (2) gasoline-fired generators, each with maximum rated capacity of 9 horsepower (hp), each exhausting to one (1) stack (S/V 64 and 65, respectively);

- (9) one (1) diesel-fired air compressor, with maximum heat input capacity of 80 horsepower (hp), exhausting to one (1) stack, identified as S/V 66;
 - (10) one (1) gasoline generator, located in Building 739A and rated at 5 kilowatts (kW);
 - (11) one (1) gasoline fired generator, identified as NS-GN-4, rated at 20 horsepower (hp), and exhausting at one (1) stack, identified as S/V 80;
 - (12) one (1) gasoline engine powered welder, identified as NS-WEL-3, rated at 11 hp, and exhausting at one (1) stack identified as S/V 84; and
 - (13) one (1) gasoline engine powered high-pressure washer, identified as NS-PW-1, rated at 16 hp, exhausting at one (1) stack identified as S/V 86.
- (b) eleven (11) emergency type generators:
- (1) one (1) diesel generator rated at 250 kW, exhausting at one (1) stack identified as S/V 21;
 - (2) one (1) diesel generator rated at 155 kW, exhausting at one (1) stack identified as S/V 22;
 - (3) one (1) diesel generator rated at 250 kW, exhausting at one (1) stack identified as S/V 23;
 - (4) one (1) diesel generator rated at 250 kW, exhausting at one (1) stack identified as S/V 24;
 - (5) one (1) diesel generator rated at 255 kW, exhausting at one (1) stack identified as S/V 25;
 - (6) two (2) gasoline generators individually rated at 4 kW, each exhausting at one (1) stack identified as S/V 30 and 34, respectively;
 - (7) two (2) natural gas generators individually rated at 125 kW, each exhausting at one (1) stack identified as S/V 55 and S/V 56, respectively;
 - (8) one (1) 941 PDS trailer rated at 25 kW, exhausting at one (1) stack identified as S/V 60; and
 - (9) one (1) diesel-fired generator, with a maximum rated capacity of 67 horsepower (hp), exhausting to one (1) stack (S/V 63).
- (c) ten (10) gasoline pumps (internal combustion engines):
- (1) three (3) pumps, located in Building 733K and each rated at 20 horsepower (HP);
 - (2) one (1) pump, located in Building 717A and rated at 20 HP;
 - (3) one (1) pump, located in Building 739A and rated at 20 HP;

- (4) one (1) pump, located in Building 739A and rated at 12 HP;
- (5) two (2) pumps, located in Building 739A and each rated at 8 HP;
- (6) one (1) pump, located in Building 710 and rated at 7.5 HP; and
- (7) one (1) pump, located in Building 725A and rated at 3 HP;
- (d) five (5) maintenance units (internal combustion engines):
 - (1) three (3) gasoline fired engines, located in Building 739A and each rated at 5.5, 20 and 10 HP, respectively;
 - (2) one (1) diesel fired engine, located in Building 725A and rated at 65 HP; and
 - (3) one (1) gasoline fired engine, located in Building 725A and rated at 55 HP;

NECDF:

- (a) one (1) #2 fuel oil fired emergency generator rated at 250 kW, exhausting at one (1) stack identified as S/V 75;
- (b) one (1) CDB neutralization process, identified as containing TCC Operations, Drained Agent Reactors, Hydrolysate and other Tanks, exhausting through one (1) stack identified as S/V 76, air emissions controlled by carbon filters and hydrolysate treated by the SCWO listed in (c);
- (c) two (2) supercritical water oxidation (SCWO) reactors, identified as Thermal Oxidizers, each rated at 50,202 pounds per day of hydrolysate feed, and exhausting to one (1) stack identified as S/V 77; and
- (d) the pollutant emitting activities related to the construction of the NECDF:
 - (1) operation of generators;
 - (2) operation of internal combustion (IC) engines; and
 - (3) miscellaneous construction related fugitive and non-fugitive insignificant activities.

The following previously permitted emission units have been removed from service during this review process:

- (a) two (2) non-emergency type generators:
 - (1) one (1) diesel generator rated at 6 kilowatts (kW), exhausting at one (1) stack identified as S/V 16; and
 - (2) one (1) gasoline generator rated at 7.5 kW, exhausting at one (1) stack identified as S/V 58;
- (b) one (1) emergency propane generator rated at 11 kW, exhausting at one (1) stack identified as S/V 37;
- (c) one (1) TML wastewater incinerator rated at 500 pounds per hour and identified as EU 9, exhausting at one (1) stack identified as S/V 51;

- (d) one (1) propane generator rated at 35 kW, exhausting at one (1) stack identified as S/V 57;
- (e) three (3) natural gas fired boilers, identified as EU Boiler 2401 A/B/C, each rated at 14.6 million (MM) British thermal units (Btu) per hour and using #2 fuel oil as a backup, each exhausting at one (1) stack identified as S/V 70, 71 and 72, respectively;
- (f) two (2) emergency type generators, each rated at 1,750 kW, each exhausting at one (1) stack identified as S/V 73 and 74, respectively.
- (g) one (1) gasoline fired generator, identified as NS-GN-5, rated at 20 horsepower (hp), and exhausting at one (1) stack, identified as S/V 81;
- (h) two (2) gasoline engine powered welders, identified as NS-WEL-1 and NS-WEL-2, each rated at 13 hp and 16 hp, respectively, and each exhausting at one (1) stack identified as S/V 82 and S/V 83, respectively; and
- (i) one (1) gasoline fired air compressor, identified as NS-AC-2, rated at 10 hp, and exhausting at one (1) stack identified as S/V 85.

New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

The application also includes information relating to the prior approval for the construction and operation of the following equipment pursuant to 326 IAC 2-8-4(11):

- (a) one (1) gasoline fired generator, identified as NS-GN-x rated at 32 horsepower (hp), and exhausting at one (1) stack, identified as S/V 95.
- (b) one (1) diesel fuel fired generator, rated at 125 kW, exhausting at one (1) stack, identified as S/V 96;
- (c) two (2) diesel fuel fired generators, each rated at 12 kW, each exhausting at one (1) stack identified as S/V 97 and 98, respectively;
- (d) one (1) diesel fuel fired emergency generator for Sprung Structure, rated at 350 kW, to be installed in 2003, identified as S/V 99.
- (e) two (2) diesel fired air compressors, rated at 76 hp and 102 hp, respectively, and identified as w-185 and w-375, respectively;
- (f) six (6) gasoline fired generators, each rated at 5.6 hp;
- (g) one (1) emergency type diesel fuel generator, rated at 125 kW;
- (h) one (1) diesel fuel aboveground storage tank (AST), ID 710, with a storage capacity of 550 gallons (insignificant activity);
- (i) one (1) 530 gallon diesel fuel AST for Sprung Structure (insignificant activity).
- (j) two (2) emergency type #2 fuel oil generators in NECDF, each rated at 2,250 kW, exhausting at one (1) stack identified as S/V 73; and

- (k) one (1) emergency type #2 fuel oil generator in NECDF, rated at 750 kW, to be installed in 2002, exhausting at one (1) stack identified as S/V 100.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) one (1) natural gas fired boiler identified as Building 7700 Boiler rated at 2.51 million (MM) British thermal units per hour, constructed prior to September 21, 1983, and using #2 fuel oil as a backup, exhausting at one (1) stack;
- (b) one (1) 1,000 gallon capacity diesel fuel underground storage tank (UST) identified as Tank #144, exhausting at one emission point;
- (c) one (1) 550 gallon capacity diesel fuel UST identified as Tank #6178, exhausting at one emission point;
- (d) one (1) 275 gallon capacity diesel fuel AST identified as Tank 733K, exhausting at one emission point;;
- (e) one (1) 1,000 gallon diesel fuel UST, identified as ORO;
- (f) one (1) 550 gallon capacity No. 2 fuel oil UST identified as Tank 7703-1, exhausting at one emission point;
- (g) one (1) 18,000 gallon capacity propane AST identified as Propane Tank at Propane Station;
- (h) one (1) 550 gallon diesel UST, identified as Tank #1;
- (i) one (1) 10,000 gallon capacity gasoline UST, exhausting at one emission point.
- (j) two (2) walk-in paint booths with total potential VOC and PM emissions of less than 3 lb/hr and 5 lb/hr, respectively, exhausting at two emission points;
- (k) four (4) cold cleaning degreasing units in buildings 716A and 717A, installed in 2000, using less than 145 gallons of solvent per year;
- (l) one (1) woodworking operation exhausting at one (1) emission point;
- (m) one (1) mobile abrasive blaster rated at 107.1 pounds blast media;
- (n) one (1) gasoline dispensing station with fuel dispensing of less than 1,300 gallons per day, exhausting at one emission point;
- (o) additional miscellaneous insignificant activities as:
 - (1) boilers/heaters (excluding Building 7700);
 - (2) medical lab;
 - (3) wastewater treatment facility;
 - (4) combustion start-up;
 - (5) 10,000 gallon capacity diesel fuel storage tank;

- (6) fire training activities;
- (7) asbestos abatement projects;
- (8) water treatment;
- (9) toxic laundry;
- (10) pesticides/herbicides;
- (11) structural painting;
- (12) welding;
- (13) air conditioning & refrigeration units;
- (14) fire suppression systems;
- (15) road paving;
- (16) fixed abrasive blaster;
- (17) protective mask cleaning;
- (18) weapons cleaning; and
- (19) miscellaneous chemical usage;
- (p) miscellaneous fugitive activities:
 - (1) landfills;
 - (2) small arms firing;
 - (3) storage piles;
 - (4) road dust; and
 - (5) prairie burns, stated as up to 110 acres per year.
- (q) one (1) oxyacetylene and stick welding station, with maximum wire consumption rate of 2.01 pounds per hour.
- (r) paved and unpaved roads and parking lots with public access;
- (s) purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process;
- (t) equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment;

- (u) on-site fire and emergency response training approved by the department;
- (v) stationary fire pumps;

- (w) any unit emitting greater than 1 pound per day but less than 5 pounds per day or 1 tons per year of a single HAP;
- (x) any unit emitting greater than 1 pound per day but less than 12.5 pounds per day of 2.5 tons per year of any combination of HAPs.
- (y) two (2) propane fired hot water heaters, each rated at 0.179 million British thermal units per hour (mmBtu/hr);
- (z) one (1) diesel generator and one (1) air compressor, each rated at 5 HP;
- (aa) one (1) diesel fired heater, rated at 0.406 million British thermal units (MMBtu) per hour, exhausting at one (1) stack, identified as S/V 87;
- (bb) four (4) portable kerosene heaters, each rated at 0.189, 0.189, 0.149 and 0.162 MMBtu/hr, respectively, and each exhausting at one (1) stack, identified as S/V 88, S/V 89, S/V 90 and S/V 91, respectively;
- (cc) three (3) propane heaters, each rated at 0.028, 0.095 and 0.095 MMBtu/hr, respectively, and each exhausting at one (1) stack, identified as S/V 92, S/V 93 and S/V 94, respectively; and
- (dd) the following equipment to be temporarily installed and operated at the existing source:
 - (1) internal combustion engines:
 - (A) non-emergency generators;
 - (B) pressure washers;
 - (C) air compressors;
 - (D) welders;
 - (E) winches;
 - (F) water pumps;
 - (G) cutting torches;
 - (H) emergency lights.
 - (2) above ground storage tanks with storage capacity less than 10,500 gallons;
 - (3) heaters;
 - (4) smoke bombs.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) FESOP (F165-5470-00003) issued on December 11, 1996, and expires on December 10, 2001.
- (b) First Significant Revision to the existing FESOP source, 165-9701-00003, issued on October 7, 1998.
- (c) First Minor Revision to the existing FESOP source, 165-10289-00003, issued on April 23, 1999.

- (d) Second Significant Revision to the existing FESOP source, 165-9659-00003, issued on December 3, 1999.
- (e) Third Significant Revision to the existing FESOP source, 165-11541-00003, issued on July 5, 2000.
- (f) Second Minor Permit Revision to the existing FESOP source, 165-12677-00003, issued on December 29, 2000.

All conditions from previous approvals were incorporated into this FESOP.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP Renewal application for the purposes of this review was received on March 8, 2001. Additional information requesting for the addition of new equipment to be reviewed together with the FESOP Renewal was received on November 6, 2001 which is considered timely because it was submitted one month prior to the expiration. Additional information was received on May 20, 2002.

Emission Calculations

See Appendix A of this document for detailed emissions calculations. (Appendix A pages 1 through 6).

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions for both the new units receiving advanced approval and the source, excluding the emission limits that were contained in the previous FESOP.

- (a) Emissions from the new units:

Pollutant	Potential To Emit (tons/year)
PM	0.4
PM-10	1.2
SO ₂	0.2
VOC	3.8
CO	73.4
NO _x	15.8

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Unrestricted Potential Emissions (tons/yr)
Single HAP	Negligible
Total HAPs	Negligible

- (1) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of CO due to the addition of new equipment is greater than 25 tons per year and less than 100 tons per year. The potential to emit of other regulated pollutants are each equal to or less than 25 tons per year. Therefore, pursuant to 326 IC 2-8-11.1(d)(4), a minor permit revision is required for the addition of the new units. The requirement for the minor permit revision will be incorporated through this FESOP renewal.

- (b) Emissions from the source:

Pollutant	Potential To Emit (tons/year)
PM	less than 100
PM-10	less than 100
SO ₂	less than 100
VOC	less than 100
CO	greater than 250
NO _x	greater than 100 less than 250

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Unrestricted Potential Emissions (tons/yr)
Single HAP	less than 10
Total HAPs	less than 25

- (1) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of CO and NO_x are each equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (2) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The source, issued a FESOP on December 11, 1996, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Potential to Emit After Issuance (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Main Operation							
Non-emergency Generators/engines (1)	0.24	0.24	0.22	0.96	15.54	3.35	negligible
Emergency Generators (1)	1.50	1.50	1.37	1.82	5.89	22.73	negligible
Paint Booths	2.94	2.94	0.00	6.68	0.00	0.00	negligible
NECDF (2)							
During Construction Period	0.00	0.00	23.04	6.00	38.76	37.08	negligible
Operations Period (after construction)							
Emergency Generators (1)	1.41	1.41	7.29	1.45	10.24	44.83	negligible
Other Equipment	0.00	0.00	13.97	1.37	1.93	4.78	negligible
Equipment for Short-term use	5.00	5.00	5.00	5.00	5.00	5.00	negligible
Insignificant & Trivial Activities	45.51	44.96	1.05	12.34	3.04	11.71	0.66
Total PTE during NECDF Construction	50.19	49.64	25.68	27.80	63.23	74.87	< 10
Total PTE during NECDF Operations	56.60	56.05	28.90	29.62	41.64	92.40	< 10

- (1) Emissions from these units are based on limited operating hours.
(2) Emissions from NECDF operations and emissions from NECDF construction are mutually exclusive.

County Attainment Status

The source is located in Vermillion County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Vermillion County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

- (a) The 18,000 gallon propane storage tank is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.110, Subpart K; 40 CFR Part 60.110a, Subpart Ka; and 40 CFR Part 60.110b, Subpart Kb) "Standards of Performance for Volatile Organic Liquid Storage Vessels" since the storage tank is designed to operate in excess of 204.9 kPa.
- (b) The eleven (11) storage tanks (Items (b) through (f), (h) through (k), (q)(5) and (ff)(2) listed in Section A.3 as insignificant activities), are not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.110, Subpart K, 60.110a, Subpart Ka, and 60.110b, Subpart Kb) "Standards of Performance for Volatile Organic Liquid Storage Vessels". Each tank has a storage capacity below the minimum 40 cubic meter (10,500 gallon) applicability threshold of all the three Subparts and, therefore, the facilities are exempt from the provisions of these Subparts.
- (c) The storage tanks to be temporarily installed and operated at the existing source shall have individual storage capacities of less than 10,500 gallons (40 cubic meter (m³)). Therefore, the requirements of New Source Performance Standards, Subpart Kb (326 IAC 12 and 40 CFR 60.110b - 60.117b), do not apply.
- (d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.
- (e) The requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP), do not apply to this source for the propane storage tank, identified as Propane Tank, with a maximum storage capacity of 18,000 gallons (as an insignificant activity). On March 13, 2000, U.S. EPA issued a final rule amending Part 68 to add §68.126 (Exclusions), removing flammable substances used as fuel from the list of applicable substances. This included the removal of propane, which is used as fuel for the combustion units (as Insignificant Activities) at this source.

State Rule Applicability - Entire Source

326 IAC 2-2 and 40 CFR 52.21 (Prevention of Significant Deterioration, PSD)

Pursuant to 326 IAC 2-2 and 40 CFR 52.21 (PSD), this source, constructed prior to 1980, is not considered a major source. This source is not one of the 28 listed source categories and it does not have the potential to emit of 250 tons per year or more of any criteria pollutant. Therefore, the requirements of 326 IAC 2-2 and 40 CFR 52.21 (Prevention of Significant Deterioration, PSD) are not applicable.

326 IAC 2-6 (Emission Reporting)

This source is located in Vermillion County and the potential to emit of each regulated pollutant is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 2-8-4 (FESOP)

This source is subject to 326 IAC 2-8-4 (FESOP). Pursuant to this rule, the following conditions apply:

- (a) The operating hours of each of the non-emergency generators listed under Section D.1 shall as follows:

- (1) 360 hours per twelve (12) consecutive month period for diesel generators #17, #18, #19, #20 and #27 and gasoline generators #28, #29, #33, #59, the unit in 739A, #80, #84, #86 and #95.
- (2) 180 hours per twelve (12) consecutive month period for diesel generator #66 and gasoline generators #64 and #65.
- (3) 100 hours per twelve (12) consecutive month period for the fourteen (14) gasoline IC engines and the one (1) 65 hp diesel engine in 725A.

The above operating limits shall limit total CO and NOx emissions from the non-emergency generators listed under Sections D.1 and D.2 to 10.46 and 3.00 tons per twelve (12) consecutive month period, respectively.

- (b) The operation of each of the emergency generators listed under Section D.3 shall not exceed 500 hours per twelve (12) consecutive month period. This operating limit shall limit total CO and NOx emissions from the twenty-eight (28) emergency generators to 16.13 and 67.56 tons per twelve (12) consecutive month period, respectively.
- (c) The operation of each of the fifteen (15) internal combustion (IC) engines listed under Section D.4 shall not exceed 100 hours per twelve (12) consecutive month period. These operating limits shall limit total CO and NOx emissions from the fifteen (15) IC engines to 5.08 and 0.35 tons per twelve (12) consecutive month period, respectively.
- (e) The CDB neutralization process shall process no more than 6 Tonne containers per day. The concentration of VX in the exhaust gas, when emitting to the atmosphere, shall be limited to 0.06 micrograms per cubic meter. This operating limit shall limit total volatile organic compound (VOC) emissions from the CDB process to 1.36 tons per year.
- (f) The input to each of the two (2) SCWO reactors shall not exceed 50,202 pounds per day of hydrolysate feed. This operating limit shall limit total SO₂, VOC, CO and NOx emissions from the SCWO to 13.97, 0.01, 1.93 and 4.78 tons per twelve (12) consecutive month period, respectively.
- (g) During the construction of the NECDF, the emissions of SO₂, VOC, CO and NOx due to the operation of generators and internal combustion (IC) engines (excluding mobile sources such as, backhoes, bulldozers, and other construction equipment) related to the construction shall not exceed 1.92, 0.50, 3.23 and 3.09 tons per month, respectively.
- (h) The operations of the equipment to be installed temporarily and covered under Section D.7 are limited such that the potential to emit for each regulated pollutant (PM-10, VOC, SO₂, NO_x and CO) is limited at 5 tons per twelve (12) consecutive month period.

By accepting the above limitations the source wide particulate matter (PM-10), sulfur dioxide (SO₂), carbon monoxide (CO), nitrogen oxide (NOx) and VOC emissions are each limited to less than 100 tons per year, therefore the source satisfies the requirements of 326 IAC 2-8 (FESOP) and is not subject to the requirements of 326 IAC 2-7.

326 IAC 5-1 (Visible Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute

averaging period as determined in 326 IAC 5-1-4.

- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

This source is subject to 326 IAC 6-4 for fugitive dust emissions. Pursuant to 326 IAC 6-4, fugitive particulate matter emissions shall not be visible crossing the property lines.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

This source is not subject to 326 IAC 6-5 for fugitive particulate matter emissions, because the source is not located in any area listed under 326 IAC 6-5-1(a) and the source has received all the necessary preconstruction approvals before December 13, 1985. Therefore, pursuant to 326 IAC 6-5-1, the requirements of 326 IAC 6-5 do not apply.

State Rule Applicability - Individual Facilities

326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heating)

The 2.51 million (MM) Btu/hr boiler is subject to 326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heating). The facility was constructed prior to September 21, 1983 and is subject to the emission limitation at 326 IAC 6-2-3. Pursuant to this rule, particulate emissions from indirect heating facilities shall be limited by the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}} = \frac{50 \times 0.67 \times 25}{76.5 \times 2.51^{0.75} \times 1^{0.25}} = 5.49 \text{ lb/mmBtu}$$

The allowable particulate emission rate from the 2.51 mmBtu/hr boiler, based on the above equation, is 5.49 pounds per mmBtu heat input which is higher than the maximum of 0.6 pounds per mmBtu heat input allowed by 326 IAC 6-2-3(d). Therefore, the allowable PM emissions for the 2.51 mmBtu/hr boiler is 0.6 pounds per mmBtu heat input.

Compliance Calculation:

$$\begin{aligned} \text{Potential PM Emissions after Control} &= 0.02 \text{ tons/yr (see Appendix A: Emission Calculations)} \\ &= (0.02 \text{ tons PM/yr}) * (2,000 \text{ lbs/ton}) * (1 \text{ year}/8,760 \text{ hours}) * (1 \text{ hour}/2.51 \\ &\quad \text{MMBtu}) \\ &= 0.034 \text{ lbs PM/MMBtu} \end{aligned}$$

Potential pounds of particulate matter per million Btu of heat input (0.034 lbs/MMBtu) is less than the allowable rate of 0.6 lbs/MMBtu, therefore, the 2.51 MMBtu/hr boiler will comply with the requirements under 326 IAC 6-2-3.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

The sulfur dioxide emissions from the one (1) 2.51 MMBtu/hr boiler burning No. 2 distillate fuel oil are not subject to the requirements of 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations), because the potential SO₂ emissions from the boiler are less than 25 tons per year. Pursuant to 326 IAC 7-1.1-1, the requirements of 326 IAC 7-1.1 do not apply.

326 IAC 8-1-6 (New Facilities)

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, and which have potential volatile organic compound (VOC) emissions of 25 tons per year or more. This source has two (2) walk-in paint booths (S/V9 & 12) that were constructed after January 1, 1980; however, neither facility has potential VOC emissions at, or in excess of 25 tons per year; therefore, this rule does not apply.

326 IAC 8-2-9 (VOC Emission Limitations for Miscellaneous Metal Coating Operations)

The two (2) walk-in paint booths were constructed in 1983 and the surface coating operations have potential VOC emissions below 25 tons per year (the surface coating operations at the source have potential VOC usage of less than 3 lb/hr and are considered to be insignificant activities). Therefore, pursuant to 326 IAC 8-2-1, the requirements of 326 IAC 8-2-9 for miscellaneous metal coating operations are not applicable to the two coating facilities.

326 IAC 8-3-2 (Cold Cleaner - Organic Solvent Degreasing Operations)

The four (4) cold cleaning degreasing units installed in 1988 are subject to the requirements of 326 IAC 8-3-2. The source shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

The requirements of this rule apply to cold cleaning degreasers without remote solvent reservoirs that either existed as of July 1, 1990 and were located in a specified county, or the cleaning facility was constructed after July 1, 1990 and was located anywhere in the state. This source, located in Bartholomew County, which is a non-listed county, is not subject to the applicable rule requirements since the degreaser has a remote solvent reservoir.

326 IAC 8-4 (Petroleum Sources)

Pursuant to 326 IAC 8-4-1, the gasoline dispensing operation at the source is not subject to the requirements of 326 IAC 8-4 (Petroleum Sources), because the source is not located in one of the counties listed in 326 IAC 8-4-1(a). Therefore, the requirements of 326 IAC 8-4 do not apply.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This rule applies to sources commencing operation after October 7, 1974 and prior to January 1, 1980, located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. This source does not have potential VOC emissions at, or in excess of 100 tons per year; therefore, this rule does not apply.

Testing Requirements

Testing is not required for the emergency and non-emergency generators, because compliance with

the CO and NO_x emission limits can be demonstrated through record keeping and reporting.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

- (a) The operation of the CDB neutralization process has applicable compliance monitoring conditions as specified below:
 - (1) The Permittee shall operate the SCWO reactors with an average temperature of at least 1,200 °F and at a minimum of no less than 900 °F or the temperature established during the latest stack test.
 - (2) The Permittee shall perform the visible leak checks as follows:
 - (A) Leak checks shall be performed once per shift during normal daylight when the CDB process is operating. A trained employee shall record any detected leaks and the date of such leaks.
 - (B) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
 - (C) In the case of batch or discontinuous operations, checks shall be taken during that part of the operation that would normally be expected to cause the greatest potential for liquid leaks.
 - (D) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of liquid leaks for that specific process.
 - (E) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

These monitoring conditions are necessary because the SCWO reactors and the CDB neutralization process must operate properly to ensure compliance with 326 IAC 2-8-4 (FESOP).

Conclusion

The operation of this National Defense - Chemical Stockpile Storage Site shall be subject to the conditions of the attached proposed **FESOP No.: F165-14084-00003**.

Appendix A: Emissions Summary

Page 1 of 6 TSD App A

Company Name: Newport Chemical Depot
Address City IN Zip: Indiana State Road 63, Newport, Indiana 47966-0160
FESOP: F165-14084
Plt ID: 165-00003
Reviewer: Scott Pan/ENV
Date: May 20, 2002

Potential Emissions

Emission Source Description	PM	PM-10	SO ₂	Pollutant (tons/yr)		CO	Single HAP	Total HAPs
				NO _x	VOC			
Significant Activities								
Main Operation								
Non-emergency Generators	6.91	6.91	6.31	98.94	40.48	715.33	Negligible	Negligible
Emergency Generators	1.50	1.50	1.37	22.73	1.82	5.89	Negligible	Negligible
Paint Booths	2.94	2.94	0	0	6.68	0	Negligible	Negligible
NECDF								
Emergency Generators	1.41	1.41	7.29	44.83	1.45	10.24	Negligible	Negligible
Other Equipment	0.00	0.00	13.97	4.78	1.37	1.93	Negligible	Negligible
Equipment for Short-term Use	5.00	5.00	5.00	5.00	5.00	5.00	Negligible	Negligible
Equipment for NECDF construction	0.00	0.00	23.04	37.08	6.00	38.76	Negligible	Negligible
Insignificant Activities								
Boiler	0.02	0.08	0.01	1.10	0.06	0.92	Negligible	Negligible
Blasters	21.9	21.9	0.00	0.00	0.00	0.00	Negligible	Negligible
Woodworking	21.9	21.9	0.00	0.00	0.00	0.00	Negligible	Negligible
SDG lab. (NECDF)	0.18	0.18	1.02	6.03	0.18	1.38	Negligible	Negligible
Other Insignificant Activities	0.65	0.65	0.02	3.40	12.10	0.74	Negligible	Negligible
Trivial Activities	0.86	0.25	0.00	1.18	0.00	0.00	0.66	0.66
Total	63.27	62.72	34.99	187.99	69.14	763.02	0.66	0.66

Limited Emissions

Emission Source Description	PM	PM-10	SO ₂	Pollutant (tons/yr)		CO	Single HAP	Total HAPs
				NO _x	VOC			
Significant Activities								
Main Operation								
Non-emergency Generators	0.24	0.24	0.22	3.35	0.96	15.54	Negligible	Negligible
Emergency Generators	1.50	1.50	1.37	22.73	1.82	5.89	Negligible	Negligible
Paint Booths	2.94	2.94	0.00	0.00	6.68	0.00	Negligible	Negligible
NECDF								
Emergency Generators	1.41	1.41	7.29	44.83	1.45	10.24	Negligible	Negligible
Other Equipment	0.00	0.00	13.97	4.78	1.37	1.93	Negligible	Negligible
Equipment for Short-term Use	5.00	5.00	5.00	5.00	5.00	5.00	Negligible	Negligible
Equipment for NECDF construction	0.00	0.00	23.04	37.08	6.00	38.76	Negligible	Negligible
Insignificant Activities								
Boiler	0.02	0.08	0.01	1.10	0.06	0.92	Negligible	Negligible
Blaster	21.9	21.9	0.00	0.00	0.00	0.00	Negligible	Negligible
Woodworking	21.9	21.9	0.00	0.00	0.00	0.00	Negligible	Negligible
SDG lab. (NECDF)	0.18	0.18	1.02	6.03	0.18	1.38	Negligible	Negligible
Other Insignificant Activities	0.65	0.65	0.02	3.40	12.10	0.74	Negligible	Negligible
Trivial Activities	0.86	0.25	0.00	1.18	0.00	0.00	0.66	0.66
Total During NECDF Construction	50.19	49.64	25.68	74.87	27.80	63.23	0.66	0.66
Total During NECDF Operations	56.60	56.05	28.90	92.40	29.62	41.64	0.66	1.32

Note:

- (1) Emissions for generators and boilers were based on emission factors provided in the latest version of AP-42.
- (2) Limited emissions for all non-emergency generators were based on limited operating hours per year (see table 2 of 6).
- (3) Limited emissions for all emergency generators were based on 500 hours per year.
- (4) Emissions for emission units other than generators, boilers and paint booths were provided by the source and determined by IDEM to be accurate.
- (5) Emissions from NECDF operation and emissions from NECDF construction are mutually exclusive and worst-case scenario is used.

Appendix A: Potential Emissions Calculations
Non-Emergency Generators
Criteria Pollutants

Page 2 of 6 TSD App A

Company Name: Newport Chemical Depot
Address, City IN Zip: Indiana State Road 63, Newport, Indiana 47966-0160
FESOP #: F165-14084
Plt ID: 165-00003
Reviewer: Scott Pan/ENV
Date: May 8, 2002

Emission Factors (g/kW-hr)				Pollutants (tons/yr)					
				PM	PM-10	SO ₂	NO _x	VOC	CO
Diesel Fuel Generators				1.34	1.34	1.25	18.80	1.53	4.06
Gasoline Generators				0.439	0.439	0.359	6.920	12.970	267.000
Natural Gas Generators				0.206	0.206	0.003	13.50	0.511	1.64
Potential Emission in tons/yr									
	Unit ID's	hr/yr of Operation	Total Capacity (kW)						
Diesel Generators	#17, #18, #19, #20, #27	8760	337.1	4.36	4.36	4.07	61.22	4.98	13.22
	#66	8760	59.6	0.77	0.77	0.72	10.83	0.88	2.34
	65 hp diesel engine in 725A	8760	48.5	0.63	0.63	0.59	8.80	0.72	1.90
Gasoline Generators	#28, #29, #33, #59, 739 A unit	8760	86.4	0.37	0.37	0.30	5.78	10.83	222.86
	#80, #84, #86, #95								
	#64, #65	8760	13.4	0.06	0.06	0.05	0.90	1.68	34.62
	14 gasoline IC Engines	8760	170.7	0.72	0.72	0.59	11.41	21.39	440.40
TOTAL				6.91	6.91	6.31	98.94	40.48	715.33
Limited Emission in tons/yr									
	Unit ID's	hr/yr of Operation	Total Capacity (kW)						
Diesel Fuel Generators	#17, #18, #19, #20, #27	360	337.1	0.18	0.18	0.17	2.52	0.20	0.54
	#66	180	59.6	0.02	0.02	0.01	0.22	0.02	0.05
	65 hp diesel IC engine in 725A	100	108.1	0.02	0.02	0.01	0.22	0.02	0.05
Gasoline Generators	#28, #29, #33, #59, 739 A unit	360	86.4	0.02	0.02	0.01	0.24	0.44	9.16
	#80, #84, #86, #95								
	#64, #65	180	13.4	0.00	0.00	0.00	0.02	0.03	0.71
	14 gasoline IC Engines	100	170.7	0.01	0.01	0.01	0.13	0.24	5.03
TOTAL				0.24	0.24	0.22	3.35	0.96	15.54

Methodology

Emission Factors were obtained from AP-42, 5th edition.

Potential Emissions (ton/yr) = Equipment Capacity (hp) x 8,760 hrs/yr x Emission Factor (g/kW-hr) x (1/453.4 (g/lb))x (1/2000) (ton/lb)

Appendix A: Potential Emissions Calculations

Emergency Generators

Criteria Pollutants

Company Name: Newport Chemical Depot
Address, City IN Zip: Indiana State Road 63, Newport, Indiana 47966-0160
FESOP #: F165-14084
Plt ID: 165-00003
Reviewer: Scott Pan/ENV
Date: May 20, 2002

Emission Factors (g/kW-hr)			Pollutants (tons/yr)					
			PM	PM-10	SO2	NOx	VOC	CO
Industrial Diesel Fuel Generators (<= 600 hp)			1.34	1.34	1.25	18.80	1.53	4.06
Large Diesel Fuel Generators (> 600 hp)			0.43	0.43	2.46	14.59	0.43	3.34
Gasoline Generators			0.439	0.439	0.359	6.920	12.970	267.000
Natural Gas Generators			0.206	0.206	0.003	13.50	0.511	1.64
Potential to Emission in tons/yr (based on 500 hours per year)								
	Unit ID's	Total Capacity (kW)						
Main Operation								
Ind. Diesel Fuel Generators	#21-#25, #63, #96-#99, w-185 w-375, 6@5.6 hp & 1@125 kW	1992	1.47	1.47	1.37	20.65	1.68	4.46
Gasoline Generators	#30, #34,	8	0.00	0.00	0.00	0.03	0.06	1.18
Natural Gas Generators	#55, #56, #60	275	0.03	0.03	0.00	2.05	0.08	0.25
NECDF								
Ind. Diesel Fuel Generators	#75	250	0.18	0.18	0.17	2.59	0.21	0.56
Large Diesel Fuel Generators	#73, #74, #100	5250	1.23	1.23	7.12	42.24	1.24	9.68
TOTAL			2.92	2.92	8.67	67.56	3.27	16.13

Methodology

Emission Factors were obtained from AP-42, 5th edition.

Potential Emissions (ton/yr) = Equipment Capacity (hp) x 8,760 hrs/yr x Emission Factor (g/kW-hr) x (1/453.4 (g/lb)) x (1/2000) (ton/lb)

Appendix A: Emissions Calculations

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Natural Gas Combustion Only

MM BTU/HR <100

Small Industrial Boiler

Company Name: Newport Chemical Depot
Address City IN Zip: Indiana State Road 63, Newport, Indiana 47966-0160
FESOP: F165-14084
Plt ID: 165-00003
Reviewer: Scott Pan/ENV
Date: May 20, 2002

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

2.5

22.0

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.02	0.08	0.01	1.10	0.06	0.92

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 5 of 6 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only**

Page 5 of 6 TSD App A

MM BTU/HR <100

Small Industrial Boiler

HAPs Emissions

Company Name: Newport Chemical Depot

Address City IN Zip: Indiana State Road 63, Newport, Indiana 47966-0160

FESOP: F165-14084

Plt ID: 165-00003

Reviewer: Scott Pan/ENV

Date: May 20, 2002

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	2.309E-05	1.319E-05	8.245E-04	1.979E-02	3.738E-05

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	5.497E-06	1.209E-05	1.539E-05	4.178E-06	2.309E-05

Methodology is the same as page 4 of 6.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emission Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: **Newport Chemical Depot**
 Address, City IN Zip: **Indiana State Road 63, Newport, Indiana 47966-0160**
 FESOP #: **F165-14084**
 Pit ID: **165-00003**
 Reviewer: **Scott Pan/ENV**
 Date: **May 20, 2002**

State Potential Emissions (uncontrolled):																
Material (as applied)	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	Lb VOC /gal solids	Transfer Efficiency
White wood primer	11.20	33.90%	0.00%	33.90%	0.00%	50.00%	1.000	0.0048	3.8	3.80	0.02	0.44	0.08	0.08	15.19	50%
Stencil white	6.12	98.80%	0.00%	98.80%	0.00%	6.00%	1.725	0.0048	6.0	6.05	0.05	1.20	0.22	0.00	201.55	50%
Stencil black	6.12	98.80%	0.00%	98.80%	0.00%	6.00%	3.319	0.0048	6.0	6.05	0.10	2.32	0.42	0.00	201.55	50%
Stencil black	9.95	40.00%	0.00%	40.00%	0.00%	43.90%	0.081	0.0048	4.0	3.98	0.00	0.04	0.01	0.01	18.13	50%
Ensign blue-545	9.00	58.90%	0.00%	58.90%	0.00%	9.00%	0.222	0.0048	5.3	5.30	0.01	0.14	0.02	0.01	117.80	50%
Halen light blue	9.00	58.90%	0.00%	58.90%	0.00%	9.00%	0.889	0.0048	5.3	5.30	0.02	0.54	0.10	0.03	117.80	50%
Ruby red	6.25	91.20%	0.00%	91.20%	0.00%	7.10%	4.320	0.0048	5.7	5.70	0.12	2.84	0.52	0.03	160.56	50%
School bus yellow	6.08	61.00%	0.00%	61.00%	0.00%	7.60%	0.987	0.0048	3.7	3.71	0.02	0.42	0.08	0.02	97.60	50%
Enamel gloss gray	9.58	65.00%	0.00%	65.00%	0.00%	21.20%	3.862	0.0048	6.2	6.23	0.12	2.78	0.51	0.14	58.75	50%
Magic green	6.33	80.60%	0.00%	80.60%	0.00%	14.20%	0.948	0.0048	5.1	5.10	0.02	0.56	0.10	0.01	71.86	50%
General purpose acrylic	9.00	58.90%	0.00%	58.90%	0.00%	9.00%	1.111	0.0048	5.3	5.30	0.03	0.68	0.12	0.04	117.80	50%
General purpose enamel	9.58	65.00%	0.00%	65.00%	0.00%	21.20%	1.357	0.0048	6.2	6.23	0.04	0.98	0.18	0.05	58.75	50%
Gloss white	7.33	76.20%	22.00%	54.20%	22.00%	5.00%	2.456	0.0048	5.1	3.97	0.05	1.13	0.21	0.05	158.91	50%
Gloss black	7.33	76.20%	0.00%	76.20%	0.00%	5.80%	3.820	0.0048	5.6	5.59	0.10	2.46	0.45	0.07	192.60	50%
Traffic yellow	8.25	56.90%	0.00%	56.90%	0.00%	31.50%	5.333	0.0048	4.7	4.69	0.12	2.89	0.53	0.20	29.80	50%
Traffic white	6.33	67.00%	0.00%	67.00%	0.00%	15.00%	1.106	0.0048	4.2	4.24	0.02	0.54	0.10	0.02	56.55	50%
Primer, surface red	9.16	44.40%	0.00%	44.40%	0.00%	38.50%	11.026	0.0048	4.1	4.07	0.22	5.17	0.94	0.59	21.13	50%
Machine safety blue	10.10	29.70%	0.00%	29.70%	0.00%	41.00%	1.000	0.0048	3.0	3.00	0.01	0.35	0.06	0.07	14.63	50%
Gray porch floor enamel	8.75	39.80%	0.00%	39.80%	0.00%	46.70%	1.500	0.0048	3.5	3.48	0.03	0.60	0.11	0.08	14.91	50%
Oil fire protection red	10.10	29.70%	0.00%	29.70%	0.00%	41.00%	0.250	0.0048	3.0	3.00	0.00	0.09	0.02	0.02	14.63	50%
Safety yellow	8.89	36.70%	0.00%	36.70%	0.00%	49.90%	2.500	0.0048	3.3	3.26	0.04	0.94	0.17	0.15	13.08	50%
Traffic yellow	11.31	25.70%	0.00%	25.70%	0.00%	43.00%	2.500	0.0048	2.9	2.91	0.03	0.84	0.15	0.22	13.52	50%
High visibility yellow	8.89	36.70%	0.00%	36.70%	0.00%	49.90%	0.750	0.0048	3.3	3.26	0.01	0.28	0.05	0.04	13.08	50%
Traffic white	12.12	24.00%	0.00%	24.00%	0.00%	54.50%	2.750	0.0048	2.9	2.91	0.04	0.92	0.17	0.27	10.67	50%
Four seasons latex	11.11	45.50%	40.00%	5.50%	40.00%	36.90%	0.250	0.0048	1.0	0.61	0.00	0.02	0.00	0.02	3.31	50%
Oil shale gray	10.10	29.70%	0.00%	29.70%	0.00%	41.00%	2.750	0.0048	3.0	3.00	0.04	0.95	0.17	0.21	14.63	50%
Alkyd gloss green	8.07	53.30%	0.00%	53.30%	0.00%	28.90%	1.000	0.0048	4.3	4.30	0.02	0.50	0.09	0.04	29.77	50%
Aluminum heat res	9.04	57.40%	0.00%	57.40%	0.00%	26.20%	0.250	0.0048	5.2	5.19	0.01	0.15	0.03	0.01	39.61	50%
Cold galv zinc	12.52	15.60%	0.00%	15.60%	0.00%	84.00%	0.500	0.0048	2.0	1.95	0.00	0.11	0.02	0.06	4.65	50%
Epoxy thinner	7.25	100.00%	0.00%	100.00%	0.00%	0.00%	1.000	0.0048	7.3	7.25	0.03	0.84	0.15	0.00		50%
Epoxy thinner	7.25	100.00%	0.00%	100.00%	0.00%	0.00%	1.000	0.0048	7.3	7.25	0.03	0.84	0.15	0.00		50%
Oil gloss black	7.77	44.30%	0.00%	44.30%	0.00%	47.20%	4.000	0.0048	3.4	3.44	0.07	1.59	0.29	0.18	14.58	50%
Acrylic light gray	9.13	48.70%	0.00%	48.70%	0.00%	37.00%	1.000	0.0048	4.4	4.45	0.02	0.51	0.09	0.05	24.03	50%
Spray thinner	7.45	100.00%	0.00%	100.00%	0.00%	0.00%	1.000	0.0048	7.5	7.45	0.04	0.86	0.16	0.00		50%
Urethane thinner	8.03	100.00%	0.00%	100.00%	0.00%	0.00%	1.000	0.0048	8.0	8.03	0.04	0.93	0.17	0.00		50%
Latex flat white	11.11	45.50%	40.00%	5.50%	40.00%	36.90%	1.750	0.0048	1.0	0.61	0.01	0.12	0.02	0.11	3.31	50%
Latex oyster white	11.30	45.50%	40.00%	5.50%	40.00%	34.00%	1.000	0.0048	1.0	0.62	0.00	0.07	0.01	0.06	3.66	50%
Total State Potential Emissions:											1.53	36.62	6.68	2.94		
Federal Potential Emissions (controlled):																
Total Federal Potential Emissions:									Control Efficiency:		Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr		
									VOC	PM						
									0.00%	0.00%	1.53	36.62	6.68	2.94		

Methodology:
 Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
 Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
 Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
 Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
 Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
 Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)
 Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids) * Transfer Efficiency
 Total = Worst Coating + Sum of all solvents used
 Controlled emission rate = uncontrolled emission rate * (1 - control efficiency)